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Infowars, LLC and Free Speech Systems, LLC*

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MATT FURIE,  
  
Plaintiff,

vs.

INFOWARS, LLC; FREE SPEECH  
SYSTEMS, LLC,  
  
Defendants.

Case No. 2:18-cv-01830-MWF-JPR

**APPLICATION FOR LEAVE TO  
FILE UNREDACTED VERSION  
OF EXHIBIT 1 TO  
DEFENDANTS' REPLY IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT UNDER  
SEAL**

Hon. Michael W. Fitzgerald

Case Filed: March 5, 2018

Trial Date: July 16, 2019

Pursuant to L.R. 79-5.2.2, Defendants Free Speech Systems, LLC (“FSS”) and Infowars, LLC (“Infowars”) file their application for leave to file **Exhibit 1** to Defendants’ Reply in Support of their concurrently-filed Motion for Summary Judgment (the “Reply”) under seal. **Exhibit 1** to the Reply is a document designated as Confidential pursuant to the Protective Order on file in this case (Doc. No. 62). Specifically, this document is a licensing agreement Plaintiff Matt Furie entered into with a third party, Momo Entertainment Limited, regarding use of the Pepe the Frog character.

On April 19, 2019, counsel for the parties conferred regarding the necessity of filing this designated document under seal, or if redactions would be appropriate. Counsel for Plaintiff stated that this document did not need to be filed under seal in its entirety and identified portions of this document to be redacted. Under L.R. 79-5.2.2(a)-(b), a supporting declaration of counsel for Defendants is attached identifying the redacted document and efforts made to resolve the issues of redaction and sealing.

Dated: April 22, 2019

Respectfully submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Alex J. Shepard

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 22, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notice of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Alex J. Shepard

Alex J. Shepard, CA Bar No. 295058